

Exhibit “1”

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Bayramoglu Law Offices LLC

Attorneys-at-Law

Las Vegas Office

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September 12, 2024

VIA CERTIFIED MAIL TO:

DMCA Copyright Agent
Google LLC, D/B/A YouTube
901 Cherry Ave.,
San Bruno, CA 94066

VIA PROCESS SERVER TO:

Registered Corporate Agent
1505 Corporation CSC - LAWYERS INCORPORATING SERVICE
2710 Gateway Oaks Drive,
Sacramento, CA 95833

Re: DMCA Takedown Notice Pursuant to 17 U.S.C. § 512(c)(3)(A)

To Whom It May Concern:

I am an attorney with Bayramoglu Law Offices, LLC and we are authorized by our client, Zhenjing Kuang (“Mr. Kuang”), to act on his behalf regarding Mr. Kuang’s ownership of exclusive rights in and to numerous original videos of monkeys and Mr. Kuang’s interactions with monkeys. We are therefore submitting to you the following DMCA Takedown Notice pursuant to 17 U.S.C. § 512(c)(3)(A).

Mr. Kuang has nearly 2 million followers on TikTok where he posts his videos of himself interacting with monkeys. Mr. Kuang is also the owner of the “Monkey Mania” channel on YouTube with the user name “@RealMonkeyKing.” Mr. Kuang’s channels can be found at the following links:

<https://www.douyin.com/user/MS4wLjABAAAAJkzrqXSmES9YUoNIYkuiXmPh1D-Rnu4F8Hc-pXHzhuc>

<https://www.youtube.com/@RealMonkeyKing>

It has come to our attention that numerous videos from Mr. Kuang’s above accounts, including numerous videos in which Mr. Kuang personally appears in the video, are being pirated

by the user “@NaughtyMonkeys” and uploaded to the channel “Naughty Monkeys-2118.” The infringing “Naughty Monkeys-2118” channel can be found at the following link:

<https://www.youtube.com/@NaughtyMonkeys>

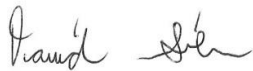
Due to the volume of infringing videos on the “Naughty Monkeys-2118” channel that are directly pirating Mr. Kuang’s videos, it is not feasible to identify every single infringing video. However, the pattern of infringement is substantial enough that the entire “Naughty Monkeys-2118” channel should be disabled for its blatant and repeated violation of Mr. Kuang’s intellectual property rights, use of Mr. Kuang’s image and likeness without permission, and violation of YouTube’s Terms of Service. We are therefore requesting that YouTube take expeditious action to disable the entirety of the “Naughty Monkeys-2118” channel and block the user that owns the “@NaughtyMonkeys” account from creating new channels or take other appropriate measures to prevent further infringements pursuant to any “repeat infringer” policies YouTube may have.

I may be contacted through the following information:

Attn: David Silver
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Henderson, NV 89014
Email: david@bayramoglu-legal.com
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I hereby state that I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law. Additionally, I hereby state that the information in this notification is accurate, and under penalty of perjury, that I am an agent authorized to act on behalf of the owner of an exclusive right that is being infringed.

Best regards,



David Silver
Attorney-at-Law
Bayramoglu Law Offices, LLC